

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
LINDA BAKER

07-CV-5621 [LAP]

Plaintiff,
-against-

**PLAINTIFF'S
NOTICE FOR
DISCOVERY
AND INSPECTION**

PORT AUTHORITY TRANS-HUDSON CORPORATION

Defendant.
-----X

In accordance with the Rules of Civil Procedure, you are requested to produce for inspection and copying at Michael H. Zhu, Esquire, P.C., 14 Wall Street, 22nd Floor, New York, New York 10005, the following documents:

1. Any and all accident reports pertaining to the accident in question.
2. Any and all investigation reports pertaining to the accident in question.
3. Pre-Sign-On Physical Examination prior to plaintiff's employment with defendant.
4. Any incident report, inspection and maintenance records involving the equipment, instrumentality, location, or condition involved in this action for a period of three years prior and six months subsequent to the incident alleged in plaintiff's Complaint.
5. All photographs, blueprints, diagrams, drawings, videotapes, motion pictures and/or other documents depicting the equipment, instrumentality, location, or equipment where the accident occurred and any photographs, blueprints, diagrams, drawings and other documents depicting the local or surrounding area

of the site of the accident and/or any equipment and/or instrumentalities involved in the accident.

6. Names and reports of any experts who will testify at trial pertaining to the accident.

7. Earnings records of plaintiff for the last five years.

8. All writings concerning safety rules or regulations pertaining to plaintiff's job assignments at the time of the accident.

9. All medical records and reports pertaining to the accident.

10. All medical records and reports pertaining to plaintiff's physical condition from commencement of employment with defendant to the present.

11. Copy of plaintiff's entire personnel file from the date of employment with defendant.

12. Any and all statements in your possession made by the plaintiff relevant to this matter.

13. Any and all witness statements in your possession regarding plaintiff's accident.

14. Any and all memoranda, notes, documents, forms, reports, graphs, charts, and other writings, computerized or otherwise, in the possession and/or control of the defendant generated as the result of an investigation of the accident alleged in plaintiff's Complaint.

15. Any and all surveillance films of plaintiff and reports of such surveillance in the possession and/or control of the defendant and/or its representatives.

16. Any and all memoranda, notes, documents, forms, reports, graphs, charts, and other writings, computerized or otherwise, in the possession and/or control of the defendant documenting any

accident and/or injury to an Amtrak employee or other individual for a period of three years prior and six months subsequent to the incident alleged in plaintiff's Complaint.

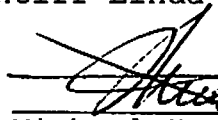
17. Any and all memoranda, notes, documents, forms, reports, graphs, charts, and other writings, computerized or otherwise, in the possession and/or control of the defendant reflecting any complaints about the equipment, instrumentality, location, or condition involved in plaintiff's accidents for a period of three years prior and six months subsequent to the incidents alleged in the Complaint.

Dated: August 22, 2007
New York, NY

Yours etc,

Michael H. Zhu, Esq. PC
Attorneys for
Plaintiff Linda Baker

By:


Michael H. Zhu

14 Wall Street - 22nd Floor
New York, New York 10005-1198
(212) 227-2245

Index No. Year RJl No. Hon.

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Defendants.

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MICHAEL H. ZHU, ESQ.

Attorneys for Plaintiff Linda Baker

Office and Post Office Address. Telephone

14 WALL STREET, 22ND FLOOR
NEW YORK, N.Y. 10005
(212) 227-2245

To

Signature (Rule 130-1.1-a)

.....
Print name beneath

Attorney(s) for

Service of a copy of the within

is hereby admitted.

Dated,

.....
Attorney(s) for

Please take notice

☐ NOTICE OF ENTRY

that the within is a (*certified*) true copy of a
duly entered in the office of the clerk of the within named court on

☐ NOTICE OF SETTLEMENT

that an order
settlement to the HON.
of the within named court, at
on

at

M

of which the within is a true copy will be presented for
one of the judges

Dated,

Yours, etc.
MICHAEL H. ZHU, ESQ.
Attorneys for plaintiff Linda Baker
Office and Post Office Address
14 WALL STREET, 22ND FLOOR
NEW YORK, N.Y. 10005

To

Attorney(s) for